

Mr. Vince Dimino  
Sonoco Flexible Packaging  
P.O. Box 188, U.S. 31 North  
Edinburgh, Indiana 46124-0108

Re: Significant Source Modification No:  
081-12310-00005

Dear Mr. Dimino:

Sonoco Flexible Packaging applied for a Part 70 operating permit on November 16, 1996 for a coated and laminated materials and commercial printing operation. An application to modify the source was received on May 30, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Two (2) paint stations to be added to the rotogravure printing press identified as EU 101 (6RL), having a rated line speed of 1000 ft/min and a rated printing width of 52 inches, using thermal incineration as control, fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack S11.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(1)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction, the source cannot operate until an Operation Permit Validation Letter is issued.

Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Kate Meyer, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Ms. Meyer. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments  
ERG/KH

cc: File - Johnson County  
U.S. EPA, Region V  
Johnson County Health Department  
Air Compliance Section Inspector - Marc Goldman  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Sonoco Flexible Packaging  
6502 South U. S. Highway 31  
Edinburgh, Indiana 46124-0188**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 081-12310-00005	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a coated and laminated materials and commercial printing operation.

Responsible Official: Vince Dimino  
Source Address: 6502 South U.S. Highway 31, Edinburgh, Indiana, 46124  
Mailing Address: P.O. Box 188, U.S. 31 North, Edinburgh, Indiana 46124-0188  
Phone Number: (812) 526-5511 ext. 224  
SIC Code: 2671, 2754, 2759  
County Location: Johnson  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

Two (2) paint stations to be added to the rotogravure printing press identified as EU 101 (6RL), having a rated line speed of 1000 ft/min and a rated printing width of 52 inches, using thermal incineration as control, fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack S11.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## B.1 Permit No Defense [IC 13]

## B.2 Definitions [326 IAC 2-7-1]

### B.3 Effective Date of the Permit [IC13-15-5-3]

#### B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

### B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

(d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.

- (2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go thru a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.
- (3) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.6 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
  - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall

submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

##### **C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum

of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

One (1) rotogravure printing press, identified as EU 101 (6RL), having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, using thermal incineration as control, fueled by natural gas at a heat input rate of 11.2 MMBtu/hr, exhausting to stack S11.

(The information describing the process contained in this facility description box is describing information and does not constitute enforceable conditions.)

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5] [326 IAC 2-2]

- (a) Pursuant to (OP 41-12-92-00092), issued on December 22, 1988, the VOC emissions from the rotogravure printing press EU 101 (6RL) shall comply with 326 IAC 8-5-5 (Volatile Organic Compound Emission Limitations for Graphic Arts System). Destruction efficiency of the thermal incinerator shall be a minimum of 90% and capture efficiency of the fume capture system used in conjunction with the thermal incinerator shall be a minimum of 75% pursuant that rule.
- (b) Pursuant to (OP 41-12-92-00092), issued on December 22, 1988, the VOC emissions from the rotogravure printing press EU 101(6RL) shall be controlled by a thermal incinerator with an overall control efficiency of 76%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.
- (c) The total amount of organic solvent delivered to rotogravure printing press 6RL shall not exceed 701.88 tons per year. This limit restricts the VOC emissions increase from the rotogravure printing press 6RL due to the proposed modification to less than 40 tons per year. Therefore, this modification is not considered a significant emissions increase and this source is not subject to additional requirements under 326 IAC 2-2.

#### D.1.2 Preventive Maintenance Plan [ 326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

#### D.1.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

#### D.1.4 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

- (a) In accordance with 40 CFR 63.821(b), the Permittee shall limit the amount of organic HAP applied to the packaging rotogravure printing press identified as EU 101 (6RL) to no more than 400 kg per month, for every month.

- (b) Any change or modification which would increase the amount of organic HAP applied to the packaging rotogravure printing press identified as EU 101 (6RL) to greater than 400 kg, shall obtain prior approval from IDEM, OAM and shall be subject to additional requirements of 40 CFR Part 63, Subpart KK.

### Compliance Determination Requirements

#### D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period within 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Methods 24 and 25 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall determine the overall control efficiency (capture efficiency and destruction efficiency) of the thermal incinerator. The operating temperature of the thermal incinerator shall be recorded during the test and incorporated as a condition in the permit. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures). This test shall be repeated at least once every 2.5 years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.1.6 Volatile Organic Compounds (VOC)

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the volatile organic compound usage for the most recent (12) month period.

### Compliance Monitoring Requirements

#### D.1.7 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ( $\pm 0.5^{\circ}\text{C}$ ), whichever is more accurate.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.8 Record Keeping Requirements [326 IAC 2-2 (PSD)]

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each day;
  - (4) The total VOC usage for each day;
  - (5) The weight of VOCs emitted for each compliance period; and

- (6) Keep thermal incinerator operating temperature.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Record Keeping Requirements [326 IAC 20-18-1] [40 CFR 63.829]

To document compliance with D.1.4, pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of the total volume and organic HAP content of each material applied to the printing press identified as EU 101 (6RL) during each month.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.11 Reporting Requirements [326 IAC 20-18-1] [40 CFR 63.830]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee submitted an initial notification, required in Section 63.9(b), to IDEM on June 1, 1998.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Sonoco Flexible Packaging  
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124-0188  
Mailing Address: P.O. Box 188, U.S. Highway 31 North, Edinburgh, Indiana 46124-0188  
Source Modification No.: 081-12310-00005

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Source Modification Quarterly Report**

Source Name: Sonoco Flexible Packaging  
Source Address: 6502 S. U.S. Highway 31, Edinburgh, Indiana 46124-0188  
Mailing Address: P.O. Box 188, U.S. Highway 31 North, Edinburgh, Indiana 46124-0188  
Source Modification No.: 081-12310-00005  
Facility:  
Parameter: Organic solvent  
Limit: 701.88 tons/yr

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Significant Source Modification

#### Source Background and Description

<b>Source Name:</b>	<b>Sonoco Flexible Packaging</b>
<b>Source Location:</b>	<b>6502 South U.S. Highway 31, Edinburgh, Indiana 46124</b>
<b>County:</b>	<b>Johnson</b>
<b>SIC Code:</b>	<b>2671, 2754, 2759</b>
<b>Operation Permit No.:</b>	<b>081-7183-00005</b>
<b>Operation Permit Issuance Date:</b>	<b>Pending</b>
<b>Significant Source Modification No.:</b>	<b>081-12310-00005</b>
<b>Permit Reviewer:</b>	<b>ERG/KM</b>

The Office of Air Management (OAM) has reviewed a modification application from Sonoco Flexible Packaging relating to the construction of the following emission units and pollution control devices:

Two (2) new paint stations to be added to the rotogravure printing press, identified as EU 101 (6RL).

#### History

On May 30, 2000, Sonoco Flexible Packaging submitted an application to the OAM requesting to add additional paint booths to the existing rotogravure printing press, identified as EU 101 (6RL). Sonoco Flexible Packaging submitted an application for a Part 70 permit on November 15, 1996 that is still pending. The source has been operating under previous approvals that are listed in the section titled Existing Approvals.

#### Existing Approvals

- (a) Amendment CP 081-8676-00005, issued on June 27, 1997,
- (b) CP 081-5840-00005, issued on January 24, 1997.
- (c) Interim CP 1-081-5480-00005, issued on June 3, 1996,
- (d) CP 081-4414-00005, issued on August 28, 1995,
- (e) CP (41) 1884-00005, issued on December 11, 1991\*,
- (f) CP (41) 1883-00005, issued on February 18, 1991,
- (g) OP (41)-12-92-0092, issued on December 22 1988,
- (h) CP (41) 1704-00005, issued on September 22 1988,
- (i) Exemption, no permit number was provided, issued on May 18, 1988, and
- (j) Registration, no permit number was provided, issued on June 15, 1987.

\*This permit (CP (41) 1884-00005) for a proposed No. 1 Press was not installed, never operated and was removed from the plant on January 31, 1996. This permit and requirements contained in this permit are not considered in effect.

### Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 30, 2000. Additional information was received on July 17, 2000.

### Emission Calculations

The emission values presented in the following tables are based on the fact that this source is a Title V source and a major source for PSD. Also, the source has indicated that the emission increase due to the modification would be significant if they did not take a limit to avoid PSD. The calculations used to determine the appropriate volatile organic compound (VOC) limits is in Appendix A (1 page).

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	<25
PM-10	<15
SO <sub>2</sub>	0
VOC	>40
CO	0
NO <sub>x</sub>	0

HAP's	Potential To Emit (tons/year)
single HAP	unknown
TOTAL	unknown

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10(f)(4) which states that any

modification with a potential to emit greater or equal to twenty-five (25) tons per year of VOC must be processed according to 326 IAC 2-7-10.5(g).

### County Attainment Status

The source is located in Johnson County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Johnson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Johnson County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	<250
PM-10	<250
SO <sub>2</sub>	<250
VOC	>250
CO	<250
NO <sub>x</sub>	<250

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon OP 41-12-91-0092.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Printing Press 6RL	<25	<15	0	<40	0	0	<40

- (a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) The VOC emitted from the entire 6RL line is limited to 168.45 tons per year. This limit is equivalent to the source's average actual emissions from 1998 and 1999 plus 39.25 tons per year from the expected modification (see Appendix A for calculations). The VOC from the modification is limited to less than 40 tons per year, therefore, PSD requirements do not apply to this modification. The VOC limit of 168.45 tons per year is equivalent to 701.88 tons of solvent per year, based on the thermal oxidizer's permitted efficiency of 76%.

### **Federal Rule Applicability**

- (a) The printing press 6RL, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60. 430 Subpart QQ), because Subpart QQ is applicable only to publication rotogravure and does not address packaging rotogravure and no other New Source Performance Standards (326 IAC 12 and 40 CFR 60) are applicable to this facility.
- (b) The printing press 6RL is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, 40 CFR 63. 820, Subpart KK. Pursuant to 40 CFR 63, Subpart KK, the rotogravure press 6RL is subject to the following conditions:
  - (1) In accordance with 40 CFR 63.821(b), the amount of organic HAP applied to the packaging rotogravure printing press 6RL shall be limited to no more than 400 kg per month, for every month.
  - (2) Any change or modification which would increase the amount of organic HAP applied to the packaging rotogravure printing press 6RL to greater than 400 kg, shall obtain prior approval from IDEM, OAM and shall be subject to additional requirements of 40 CFR Part 63, Subpart KK.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart KK.

### **State Rule Applicability - Individual Facilities**

326 IAC 8-5-5, 326 IAC 2-2 (Volatile Organic Compounds (VOCs))

- (a) Pursuant to (OP 41-12-92-00092), issued on December 22, 1988, the VOC emissions from the rotogravure printing press EU 101 (6RL) shall comply with 326 IAC 8-5-5 (Volatile Organic Compound Emission Limitations for Graphic Arts System). Destruction efficiency of the thermal incinerator shall be a minimum of 90% and overall efficiency of the fume capture system and the thermal incinerator combined shall be a minimum of 75% pursuant that rule.
- (b) Pursuant to (OP 41-12-92-00092), issued on December 22, 1988, the VOC emissions from the rotogravure printing press EU 101(6RL) shall be controlled by a thermal incinerator with an overall control efficiency of 76%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.
- (c) The total amount of organic solvent delivered to rotogravure printing press 6RL shall not exceed 701.88 tons per year. The increase in solvent use due to the proposed modification is limited to 163.54 tons per year. This limit restricts the VOC emissions

increase from the rotogravure printing press 6RL due to the proposed modification to less than 40 tons per year. Therefore, this modification is not considered a significant emissions increase and this source is not subject to additional requirements under 326 IAC 2-2. This limit replaces the limit on organic solvent delivered to rotogravure printing press 6RL that was established pursuant to OP 41-12-92-00092. The limit established in this paragraph is more stringent and therefore supersedes the previous limit.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)**

326 IAC 2-4.1 does not apply to this significant source modification because this modification is not considered a construction of a source or a reconstruction of a process or production unit, and the modification itself does not constitute a process or production unit.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The printing press 6RL has applicable compliance monitoring conditions as specified below:
  - (a) A temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade ( $\pm 0.5^{\circ}\text{C}$ ), whichever is more accurate.

These monitoring conditions are necessary because the thermal incinerator must operate within a certain range to ensure compliance with 326 IAC 8-1-12 and 8-5-5.

**Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 081-12310-00005.

**Sunoco Flexible Packaging**  
Representative VOC Usage for Line 6RL

March 2, 2000

**Tons of Solvent Applied Per Qt VOC Emissions Per Quarter**

1st Quarter 1998	94.01	22.5 (see note 1)
2nd Quarter 1998	122.44	29.3
3rd Quarter 1998	139.8	33.5
4th Quarter 1998	143.11	34.3
<b>Subtotal</b>	<b>499.36</b>	
1st Quarter 1999	131.43 (see note 2)	21 (see note 1)
2nd Quarter 1999	149.49	35.8
3rd Quarter 1999	183.67	44
4th Quarter 1999	112.73	
<b>Subtotal</b>	<b>445.89</b>	

note 1: Line was down for repair for much of these quarters - only 4 weeks in t

note 2: First quarter 1999 estimate if 6RL was not down 4 weeks:

87.63 (actual solvent applied) / 8 weeks = 10.95/week

4\*10.95=43.8

87.63+43.8=131.43

Representative amount of solvent applied (tons/year) ((499.36 + 538.34

Representative amount of emissions (tons/year) (538.34 \* 0.24) 129.2  
(0.24 emission rate is based on thermal incinerator efficiency of 76%)

Proposed amount of allowable emissions for line after paint station 168.45  
(Representative emissions plus 39.25 tons)

Proposed amount of allowable solvent for line after paint stations : 701.88  
(168.45 / 0.24)

calculations provided by Sunoco Flexible Packaging